

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
) CC Docket No. 97-181
Defining Primary Lines)

REPLY OF AMERITECH

Ameritech¹ submits this reply to comments filed in response to the
Commission's Notice of Proposed Rulemaking in this docket.²

I. CUSTOMER SELF-CERTIFICATION IS BURDENSOME AND
UNNECESSARY.

With virtual unanimity, the commenting parties took issue with the
Commission's tentative conclusion that customer self-certification is the
appropriate way to determine the difference between primary and non-primary
residential lines. And those commenting parties demonstrated the significant
problems associated with customer self-certification.³

¹ Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

² *In the Matter of Defining Primary Lines*, CC Docket No. 97-181, Notice of Proposed Rulemaking, FCC 97-316 (released September 4, 1997) ("NPRM").

³ See e.g., Rural Telephone Coalition, Southwestern Bell, U.S. West, USTA, Sprint. See also comments of GTE pointing out the problems with affirmative customer self-certification.

Ameritech would point out, however, that some parties who advocate the “subscriber” or “account” method of determining primary line would also permit a form of customer designation that is both unnecessary and problematic. Sprint, for example, favors a method that would presumptively categorize the first line on any customer account as primary. However, it also favors sending a letter to residential customers with multiple lines which would notify them of their right to change the identity of the line designated as primary. This is similar to GTE’s “reactive customer self-certification” plan.

Ameritech suggests, however, that, even if the Commission were to adopt a subscriber or account approach to the definition,⁴ there is no need for any customer input in connection with implementing the distinction between primary and non-primary lines. If one assumes that only one line on each account would be permitted primary status, it really shouldn’t matter which one is designated as primary. Letting LEC systems assign primary line status to the first installed line is reasonable and eliminates the expense of having to establish a system that accommodates exceptions. GTE, however, posits the situation in which multiple lines on a single account might be designated as primary.⁵ Ameritech submits that allowing multiple primary lines on a single account is an even greater

⁴ Ameritech, however does not favor such an approach. See Section II below.

⁵ GTE at 11-12. It is likely that, in any event, the elderly parent in GTE’s example will establish a second account, if only to get a free directory listing.

invitation to fraud than the subscriber or account method itself.⁶ Therefore, if the Commission were to adopt the subscriber or account method, only one line per account should be permitted primary status and that line should be the first line installed.

II. THE "SERVICE LOCATION" METHOD HAS SUBSTANTIAL ADVANTAGES OVER OTHER NON-CUSTOMER SELF-CERTIFICATION METHODS.

As noted above, while correctly articulating the problems with a customer self-certification method, many parties advocate a "subscriber" or "account" method of determining primary residential line status that may also have problems.⁷ However, as pointed out in Ameritech's comments, a "service location" approach, whereby the first line to a service location would be considered primary and subsequent lines non-primary, avoids many of those problems.⁸

Ameritech has several concerns with the "subscriber" or "account" method. In particular, Ameritech is concerned that the method is too easily subject to intentional manipulation or other undesirable results. For example, under that method, if a parent that orders second and subsequent lines to the residence in the names of children -- whether intentionally to obtain a lower subscriber line

⁶ See Section II below.

⁷ See, e.g., Bell Atlantic, Southwestern Bell, Sprint, USTA, GTE, Rural Telephone Coalition.

⁸ U. S. West's "premises" method is similar to Ameritech's proposal.

charge or merely to take advantage of the free directory listing in the children's names on those lines -- all lines would obtain primary status for absolutely no good policy reason. The "service location" method would avoid that result.

In addition, the "service location" method would avoid any certification burden for resellers. Obviously, the "subscriber" or "account" method does not work well where the reseller is literally the "subscriber" for incumbent LEC services for all the lines it is reselling. On the other hand, with the "service location" method, it would be easy to determine the primary or non-primary status of any residential line without any additional input from the reseller.

III. MCI's BURDENSOME DEMANDS SHOULD BE DENIED.

MCI has reiterated a claim it made in the context of petitions for reconsideration with respect to the Commission's Access Reform Order. Specifically, it asks the Commission to require that LEC bills for primary interexchange carrier charges ("PICCs") include:

- Aggregate line counts by class of customers;
- Line level detail for each billed telephone number, including all other telephone numbers associated with the billed telephone numbers;
- Identification of the class of customer for each line (if a company does not have all lines of a multiline customer PIC'd to it, it must also have the primary billed telephone line information);
- The date the line was PIC'd to each IXC;
- The date the PIC changed (if applicable);

- Trunk level detail with the same information as listed above for lines;
- Level of SLC assessed on a per line basis (for comparison to the PICC for that line); and,
- PICC charges billed separately from switched and special access charges using the CABs process.⁹

As USTA noted, on behalf of the entire LEC industry, in its reply to comments on petitions for reconsideration of the Commission's Access Reform Order, carrier billing systems may not be able to provide such detail on the carrier bill.

Ameritech would have no objection to providing reports on some of this information to IXCs at a reasonable charge. However, it would be virtually impossible to provide all that information on the access bill itself.

Similarly, MCI makes an extreme request of the Commission to require the filing of quarterly certified reports on primary and secondary lines and back-up information "which will enable all parties to determine the nature of each line."¹⁰ (Emphasis added.) Such a requirement would be burdensome and completely

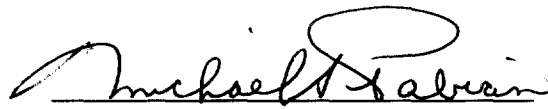
⁹ MCI at 10.

¹⁰ MCI at 15.

unnecessary. And, in any event, under Ameritech's proposal, the results would be easily auditable by reference to existing telephone record information.

MCI's burdensome requests, therefore, should be denied.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael S. Pabian", written over a horizontal line.

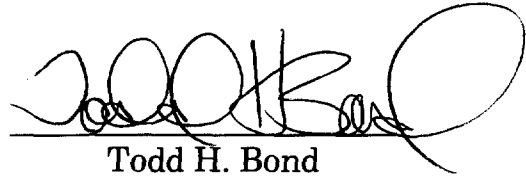
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CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of the foregoing Reply of Ameritech has been served on all parties listed on the attached service list, via first class mail, postage prepaid, on this 9th day of October, 1997.

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